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Feb 20 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
DIVISION

RAMONA A. Manus

(Name of the plaintiff or plaintiffs)

v.

Sage Hospitality Resources

(Name of the defendant or defendants)

CIVIL ACTION

08CV1037

JUDGE LEFKOW

MAGISTRATE JUDGE KEYS

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.

2. The plaintiff is RAMONA A. MANUS of the county of Clark in the state of Nev.

3. The defendant is Sage Hospitality Resources, who resides at (street address) 1512 Larimer St., Suite 800, Denver, CO 80202

(city) Denver (county) (state) CO (ZIP) 80202

(Defendant's telephone number) (303)-595-7200

I HAD MORE SENIORITY WITH COMPANY:

AGE DISCRIMINATION: Hired Feb. 2001 - VIP Services - AFTER Dec. 2001 - Human Resources + Manager placed a 25 yr. old in my position - Schedule me less hours - other employee got full time - causing me loss of hours so I couldn't qualify for health ins. payment into the pension - loss of income - Finally Dismissal - July 18, 2006 at that time Company replaced me with same younger person on my job - for 2nd time -

4) The plaintiff sought employment or was employed by the defendant at

(street address) Sheraton Chicago Northwest

(city) Arlington Heights (county) Cook (state) Illinois (ZIP code) 60005

5. The plaintiff [check one box]

- (a) was denied employment by the defendant.
- (b) was hired and is still employed by the defendant.
- (c) was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,

(month) Jan., (day) _____, (year) 2002.

7. (a) The plaintiff [check one box] has not filed a charge or charges against the defendant

asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) the United States Equal Employment Opportunity Commission on or about
 (month) May 2007 (day) 28 (year) 2007.
- (ii) the Illinois Department of Human Rights on or about
 (month) _____ (day) _____ (year) _____.

(b) If charges were filed with an agency indicated above, a copy of the charge is

attached. YES NO

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

8. (a) the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.

(b) the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) Nov. 21 -07 (Received Dec. 23-07)
 (day) _____ (year) _____ a copy of which *Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [check all that apply]

- (a) Age (Age Discrimination Employment Act).
- (b) Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (c) Disability (Americans with Disabilities Act)
- (d) National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) Religion (Title VII of the Civil Rights Act of 1964)
- (g) Sex (Title VII of the Civil Rights Act of 1964)

10. The plaintiff is suing the defendant, a state or local government agency, for discrimination on the basis of race, color, or national origin (42 U.S.C. §1983).

YES NO

11. Jurisdiction over the statutory violation alleged is conferred as follows: over Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); over 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; over the A.D.E.A. by 42 U.S.C. §12117.

12. The defendant [check all that apply]

- (a) failed to hire the plaintiff.
- (b) terminated the plaintiff's employment.
- (c) failed to promote the plaintiff.
- (d) failed to reasonably accommodate the plaintiff's religion.
- (e) failed to reasonably accommodate the plaintiff's disabilities.
- (f) other (specify): _____

13. The facts supporting the plaintiff's claim of discrimination are as follows:

I was hired Feb 2001 - Full time - Human Resources hired a 20? yrs.
 PERSON later giving her all hours due Me - Continuing over 1yr.
 Retaliation against me - No Scheduled hours causing Loss of INCOME - PENSION
 my health insurance & health issues caused by their deliberate actions
 Retaliation of my efforts to cease practices & my filed grievances AND hiring an
 ATTORNEY to collect workmens compensation for an injury occurring at work
 Human Resources didn't collect - after I was fired they Recalled SAME
 14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully ~~Human Resources~~ FOR MY
 discriminated against the plaintiff Job 1 (2nd time)

15. The plaintiff demands that the case be tried by a jury.

YES NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check all that apply]

- (a) Direct the defendant to hire the plaintiff.
- (b) Direct the defendant to re-employ the plaintiff.
- (c) Direct the defendant to promote the plaintiff.
- (d) Find that the defendant failed to reasonably accommodate the plaintiff's religion.
- (e) Find that the defendant failed to reasonably accommodate the plaintiff's disabilities.
- (f) Direct the defendant to (specify): _____

Judgment



If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.